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April 15, 2020

Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Castelle,  
18 Cr. 15 (AKH)

Dear Judge Hellerstein:

We represent Eugene Castelle on appeal from the judgment of conviction and sentence entered in the above-captioned case. On April 3, 2020 the Court released Mr. Castelle on bail pending appeal, with conditions that included that he “shall remain self-quarantined ... for 14 days after his release, subject to location monitoring .... On the tenth day of such self-quarantine, Defendant shall call Pretrial Services to report his condition and to schedule an appointment for the placement of location-monitoring equipment.” Mr. Castelle has been in contact telephonically with Pretrial Services on several occasions since his release.

I have been in periodic contact with Mr. Castelle, who reported he had been seriously ill during the first many days of his quarantine – with symptoms suggesting COVID-19, but is presently improving. Pretrial Services Officer Ashley Cosme informed me today that Mr. Castelle has reported his condition similarly to her, adding that he has not been tested for COVID-19 but does believe he was afflicted by it. Ms. Cosme therefore suggested I write to the Court “to advise of the defendant’s symptoms and request that an additional 14 days of quarantine be ordered prior to the installation of location monitoring otherwise, the defendant will be in violation of his conditions.”

I believe Ms. Cosme’s request is in both Mr. Castelle’s interest and in the interest of those who will need to interact with him when he obtains his monitoring device. Therefore, I respectfully request that the Court grant Mr.

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Castelle an additional 14 days to remain at home before being set up for location monitoring.

Thank you for considering this application.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Richard Levitt", with a horizontal line extending from the end of the signature.

Richard Levitt

cc: AUSA Jacob Fiddelman  
Pretrial Services Officer Ashley Cosme